

REMARKS

Reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks is respectfully requested. Entry of the Amendment under Rule 116 is merited as it raises no new issues and requires no further search.

By this Amendment, claims 1, 2, 9-12, 14, and 32 are amended, and claims 6 and 7 are canceled without prejudice or disclaimer. Accordingly, claims 1-5 and 8-35 are pending in this application.

Rejections under 35 U.S.C. §102(e)

Claims 14, 27, and 32 stand rejected under 35 U.S.C. §102(e) as being anticipated by Yu et al. (US 6,684,087). In response, amended and unamended claims are believed to be patentable over Yu for the reasons presented below.

Regarding claim 14, the Office Action alleges that Yu at column 7, lines 1-25, Figs. 5 and 7 discloses:

formatting the received high resolution picture data into picture file formatted data including a plurality of unit blocks of picture data and index information;
extracting a minimum number of unit blocks of picture data from the picture file formatted data....” (Emphasis added).

Applicants respectfully disagree.

Unlike Applicants method that is executed by the mobile device, Yu, at column 7, lines 7-13, appears to only disclose wherein link server 300 performs the preprocessing, and nowhere discloses wherein Yu’s mobile device performs the preprocessing, or is indeed capable of performing the preprocessing. Still further, unlike the recited method that formats the received high resolution data into a plurality of unit blocks of picture data, Yu appears to only disclose wherein the link server reformat the image so as to fit within the screen size of the mobile device. Nowhere does Yu disclose, teach, or suggest wherein the mobile device reformats the received image data into a plurality of unit blocks, let alone wherein the mobile device reformats high resolution data.

Still further, claim 14 recites wherein “extracting corresponding unit blocks of picture data as required from the picture file formatted data in a movement direction by using the index information and outputting a position-moved picture based on a scroll action generated during the display of the picture.” The Office Action alleges that Yu discloses this feature. Applicants respectfully disagree and submit that nowhere does Yu disclose, teach, or suggest a scroll action, as recited in claim 14.

Scrolling is well known in the art of computer displays as “[t]he continuous movement of information either vertically or horizontally on a video screen,” (*see* <http://www.answers.com/topic/scrolling>). Figs. 5 and 7 and the accompanying text at column 7, lines 42-52 appear to only disclose a method by which a user can drill down to a sub-region to obtain a detailed version of a requested area. Applicants respectfully submit that drilling down to obtain more detailed information is not scrolling, as disclosed by Applicants or as is normally used by those knowledgeable in the art of computerized display of information.

Regarding independent claim 27, the Office Action alleges that Fig. 3a and 3b of Yu discloses “a picture dividing unit configured to divide the high resolution picture of the picture data into a plurality of unit blocks,” (emphasis added). Applicants respectfully disagree and submit that Yu, column 8, lines 18-32 and Fig. 3a-3b, only discloses wherein “the reduced image is inherently divided into a number of subareas.” In other words, Yu does not disclose dividing a high resolution picture, as recited in amended claim 27. Unlike Applicants’ device that converts a high resolution picture that is larger than can be displayed on the mobile device into a plurality of unit blocks, storing all blocks as a file, Yu appears only to disclose dividing a reduced image picture than can appear on a mobile device screen into subareas that can be later selected for higher resolution download and viewing.

Still further, claim 27 further discloses “a converted file transmitting unit configured to transmit the converted file to the mobile communication terminal or picture providing server,” Applicants respectfully disagree and submit that Yu, at column 7, line 1-25, appears to only disclose transmitting a reduced image data file to the mobile device 350 and subsequently transmitting individual higher resolution data files of selected data. Claim 27 is distinguished from Yu in that unlike Yu that does not transmit a converted file comprising a plurality of unit blocks of high resolution data, the only complete picture file transmitted to Yu’s mobile device is

a reduced image data file, and the only high resolution picture data transmitted are singular subarea files and does not transmit a file of all the plurality of unit blocks, as recited in claim 27.

Regarding the method of claim 32, Applicants respectfully submit that claim 32 recites operating on high resolution picture data, including the step of:

dividing, at the format converting server, picture data received from the mobile communication terminal or picture providing server, into a plurality of unit blocks;

As presented above, Yu only appears to disclose dividing a low resolution picture into subareas, and does not disclose saving these subareas as a plurality of unit blocks.

Claim 32 further discloses:

generating a file converted into picture file format, including the index information and each of the unit blocks; and

transmitting the converted file including all unit blocks and index information to the mobile communications terminal.

Yu, on the other hand, appears to disclose transmitting the low resolution picture, and does not disclose sending all high resolution blocks together in a converted file, as recited in claim 32.

A rejection based on 35 U.S.C. §102 requires every element of the claim to be included in the reference, either directly or inherently. Accordingly, because Yu does not disclose, teach or suggest each and every feature recited in claims 14, 27, and 32, Applicants recited claims are distinguished over Yu and therefore the rejection of claims 14, 27, and 32 under 35 U.S.C. §102(e) is improper. Withdrawal of the rejection over Yu is respectfully requested.

Rejections under 35 U.S.C. §103(a)

Claim 1 stands rejected under 35 U.S.C. §103(a) over Yu in view of Nagata et al. (US 6,701,017). Applicants respectfully traverse this rejection and believe amended claim 1 to be patentable over the applied art for the failure of the combination of alleged references to disclose, teach or suggest all of Applicants' recited claim features. Applicants further submit that the disclosures of Yu and Nagata, taken as a whole, do not suggest Applicants' claimed mobile communication terminal.

Amended claim 1 relates to a mobile device that receives high resolution picture data, converts and stores the high resolution picture data as a plurality of unit blocks along with

indexing information. A picture data processing unit extracts a minimum number of unit blocks and outputs a partial picture based upon the extracted minimum number of unit blocks. Unlike Yu and Nagata, all operations, including the operations performed by the picture dividing unit and the picture data processing unit, are performed on the mobile device.

Applicants respectfully submit that the abstract of Yu specifically discloses wherein an image requested by a mobile device is first processed in a server device. Based upon a set of parameters about the screen of the mobile device, the server transforms the requested image into a reduced version that fits within the screen. The reduced image is divided into a number of subareas and when a user selects one of these subareas, “a new request including the link is send [sic] to the server device that consequently sends out the detailed version.” (*See also* column 7, lines 1-23).

Unlike Applicants device, the entire high definition picture is not stored on the mobile devices of Yu or Nagata. On the contrary, high resolution data of selected subareas are transmitted from a server to the mobile device as required. The mobile devices of Yu and Nagata do not include the picture dividing unit, the storage unit, or the picture data processing unit recited in claim 1 that allows the mobile device to divide the high resolution picture, store the generated block units, and extract the units as required from mobile device memory to build a partial picture.

Notwithstanding the absence of any of the preceding units in Yu’s apparatus, the Office Action does indicate that Yu fails to disclose “wherein a scroll action operates to change a position of the partial picture within the high resolution picture.” The Office Action relies upon Nagata to remedy the deficiencies of Yu. Based upon the amendments to claim 1, Applicants respectfully disagree. Like Yu, Nagata appears to only disclose downloading already divided changed picture portions to the mobile device and fails to disclose the method and apparatus recited in claim 1 by which the mobile device is responsible for both dividing and storing the high resolution picture as unit blocks on the mobile device. In this manner repeated downloads of data files from the server are omitted.

Based upon the above disclosure, Applicants respectfully submit that the asserted combination of references present no apparent reason to combine references or modify prior art to create the Applicants’ allegedly obvious claim elements. Therefore, Applicants respectfully submit that the asserted combination of references fails to disclose the mobile device, as recited

in claim 1. Withdrawal of the 103 rejection of claim 1 over Yu and Nagata is respectfully requested.

Regarding the rejection of claims 2-5 under 35 USC 103(a) as obvious over Yu in view of Nagata and Lim (US 7,238,807) Applicants respectfully submit that notwithstanding any disclosure of Lim regarding a frame buffer, Lim fails to remedy the deficiencies of Yu and Nagata in regards to claim 1 from which claims 2-5 depend. Accordingly, claims 2-5 are likewise patentable over the asserted combination of references for at least their dependence on an allowable base claim, as well as for the additional features they recite.

Similarly, the rejection of claims 15-18 and 21 under 35 USC 103(a) as obvious over Yu in view of Nagata and Lim is respectfully traversed based upon the patentability of claim 14 over Yu as presented above, and the failure of Nagata and Lim to remedy the deficiencies of Yu with regards to claim 14 from which claims 15-18 and 21 depend.

In addition claims 28, 29, 31, 34, and 35 depend variously from independent claims 27 and 32 and are likewise allowable over Yu in view of Nagata and Lim, based at least upon the failure of Nagata and Lim to cure the deficiencies of Yu in regards to those independent claims.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the present application should be in condition for allowance and a Notice to that effect is earnestly solicited.

The Examiner is invited to telephone the undersigned, Applicants' attorney of record, to facilitate advancement of the present application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

LOWE HAUPTMAN HAM & BERNER, LLP

/Yoon S Ham/
Yoon S. Ham
Registration No. 45,307

Customer Number: 22429
1700 Diagonal Road, Suite 300
Alexandria, Virginia 22314
(703) 684-1111
(703) 518-5499 Facsimile
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YSH/ERM